

1 LYSSA S. ANDERSON  
Nevada Bar No. 5781  
2 RYAN W. DANIELS  
Nevada Bar No. 13094  
3 KAEMPFER CROWELL  
1980 Festival Plaza Drive, Suite 650  
4 Las Vegas, Nevada 89135  
Telephone: (702) 792-7000  
5 Fax: (702) 796-7181  
[landerson@kcnvlaw.com](mailto:landerson@kcnvlaw.com)  
6 [rdaniels@kcnvlaw.com](mailto:rdaniels@kcnvlaw.com)

7 **Attorneys for Defendant**  
**LAS VEGAS METROPOLITAN POLICE**

8  
9 UNITED STATES DISTRICT COURT  
10 DISTRICT OF NEVADA  
11

12 BRYAN EDWARD O'NEAL, an individual;  
and KATHLEEN ROBINSON, an individual,

13 Plaintiff,  
14 vs.

15 LAS VEGAS METROPOLITAN POLICE  
DEPARTMENT, a political subdivision of the  
State of Nevada; LINDA THEOBALD, an  
16 individual; PROKOPIOS ZIROS, an individual;  
GUSTAVO RIOS, an individual; CLARK  
17 COUNTY, a County existing under the laws of  
the State of Nevada; NAPHCARE, INC., an  
18 Alabama corporation; and DOES 1 through 25,  
inclusive; and ROE CORPORATIONS 1 through  
19 25, inclusive; and POE MEDICAL  
PERSONNEL 1 through 25, inclusive;

20 Defendants.  
21

Case No.: 2:17-cv-02765-APG-GWF

**STIPULATION, REQUEST AND ORDER  
EXTENDING TIME TO ANSWER OR  
OTHERWISE RESPOND TO  
PLAINTIFF'S COMPLAINT**

(First Request)

22 Defendant Las Vegas Metropolitan Police Department ("LVMPD"), by and through its  
23 counsel, Lyssa Anderson, Esq., of the law firm of Kaempfer Crowell, and Bryan Edward O'Neal  
24 and Kathleen Robinson ("Plaintiffs"), by and through their counsel, Matthew Beasley, Esq. of  
the Beasley Law Group, PC hereby respectfully submit this Stipulation, Request and Order

1 Extending Time to Answer or Otherwise Respond to Plaintiffs' Complaint (the "Stipulation").  
2 This Stipulation is made in accordance with LR 6-1, LR 6-2, and LR II 7-1 of the Local Rules of  
3 this Court. This is the first request for an extension of time to file an answer or otherwise  
4 respond to Plaintiff's Complaint.

5 LVMPD was served with Plaintiffs' Complaint on January 12, 2018. The instant  
6 extension is requested as LVMPD's Counsel requires additional time to prepare a responsive  
7 pleading to the Plaintiffs' Complaint.

8 Upon agreement by and between all the parties hereto as set forth herein, the undersigned  
9 respectfully requests this Court grant an extension of time, up to and including February 16,  
10 2018, for LVMPD to file an answer or otherwise respond to Plaintiffs' Complaint. By entering  
11 into this Stipulation, none of the parties waive any rights they have under statute, law or rule  
12 with respect to Plaintiffs' Complaint.

13 DATED this 1<sup>st</sup> day of February, 2018.

14 KAEMPFER CROWELL

BEASLEY LAW GROUP, PC

15  
16 By: /s/ Lyssa S. Anderson  
LYSSA S. ANDERSON  
17 Nevada Bar No. 5781  
RYAN W. DANIELS  
18 Nevada Bar No. 13094  
19 1980 Festival Plaza Drive  
Suite 650  
Las Vegas, Nevada 89135  
**Attorneys for Defendant**

By: /s/ Matthew W. Beasley  
MATTHEW BEASLEY, ESQ.  
Nevada Bar No. 9756  
1872 Shy Albatross Avenue  
North Las Vegas, Nevada 89084  
**Attorney for Plaintiffs**

20 **ORDER**

21 IT IS SO ORDERED.

22   
23 UNITED STATES MAGISTRATE JUDGE

24 Dated: February 5, 2018